

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

JIAXING SUPER LIGHTING ELECTRIC APPLIANCE CO., LTD. AND OBERT, INC., Plaintiff,	)	
	)	
v.	)	CASE NO.: 6:20-cv-00018-ADA
	)	
CH LIGHTING TECHNOLOGY CO., LTD., ELLIOTT ELECTRIC SUPPLY INC., AND SHAOXING RUISING LIGHTING CO., LTD., Defendants.	)	<b>JURY TRIAL DEMANDED</b>
	)	
	)	
	)	

---

**JOINT MOTION AND [PROPOSED] ORDER FOR EXTENSION OF DEADLINES**

Plaintiffs Jiaxing Super Lighting Electric Appliance Co., Ltd. and Obert, Inc. (“Super Lighting”) and Defendants CH Lighting Technology Co., Ltd. and Shaoxing Ruising Lighting Co., Ltd. (“CH Lighting”) and Elliott Electric Supply Inc. (“Elliott”) (collectively, the “Parties,” and individually, a “Party”), by and through their undersigned counsel and subject to the approval of the Court, hereby stipulate and agree that the following deadlines set forth in the Scheduling Order (Dkt. No. 29) and their proposed Joint Motion and Proposed Order for Extension of Deadlines (Dkt. No. 119) shall be extended as set forth in the table below. All other case deadlines in the Scheduling Order shall remain unchanged.

WHEREAS, the Court permitted an extension of the close of fact discovery until June 7, 2021 during the hearing held on April 28, 2021;

WHEREAS, an expert witness of Defendants has a serious medical emergency, forcing him to withdraw from the case;

WHEREAS, the Parties agree to extend the deadline for opening expert reports by one week to June 21, 2021, and the deadline for rebuttal expert reports by one week to July 19, 2021;

WHEREAS, the Parties' agreed extensions will not alter the Court's trial setting for October 21, 2021;

NOW, THEREFORE, SUBJECT TO APPROVAL BY THE COURT, IT IS HEREBY STIPULATED AND AGREED that the scheduling order in this case shall be modified to set the following case deadlines:

<b>Event</b>	<b>Current Dates in Dkt. # 119<sup>1</sup></b>	<b>Proposed Deadline</b>
Close of Fact Discovery	June 7, 2021	No change; June 7, 2021
Opening Expert Reports	June 14, 2021	June 21, 2021
Rebuttal Expert Reports	July 12, 2021	July 19, 2021
Close of Expert Discovery	July 26, 2021	No change; July 26, 2021
Daubert/Motions for Summary Judgment	August 6, 2021	No change; August 6, 2021

IT IS FURTHER STIPULATED AND AGREED that all other case deadlines shall remain as previously ordered by the Court.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2021.

---

ALAN D ALBRIGHT  
UNITED STATES DISTRICT JUDGE

---

<sup>1</sup> On May 22nd, Mr. Robert Earle from Judge Albright's chambers confirmed the Court would be granting the motion set forth in Docket No. 119.

Dated: June 8, 2021

Respectfully Submitted,

/s/ Robert S. Hill

Robert S. Hill (Lead counsel)  
Texas Bar No. 24050764  
Email: robert.hill@hklaw.com  
Sara Schretenthaler Staha  
Texas Bar No. 24088368  
HOLLAND & KNIGHT LLP  
200 Crescent Court, Suite 1600  
Dallas, TX 75201  
Telephone: (214) 964-9500  
Facsimile: (214) 964-9501

Allison M. Lucier (*Pro Hac Vice*)  
Massachusetts Bar No. 569193  
Email: allison.lucier@hklaw.com  
10 Saint James Avenue, 11<sup>th</sup> Floor  
Boston, MA 02116  
Telephone: (617) 523-2700  
Facsimile: (617) 523-6850

Stacey H. Wang (*Pro Hac Vice*)  
California Bar No. 245195  
Email: stacey.wang@hklaw.com  
400 South Hope Street  
Los Angeles, CA 90071  
Telephone: (213) 896-2400

Leonie Huang (*Pro Hac Vice*)  
New York Bar No. 5128442  
Email: leonie.huang@hklaw.com  
31 West 52nd Street  
New York, New York 10019  
Telephone: (212) 513-3398  
Facsimile: (212) 385-9010

*Attorneys for Defendants CH LIGHTING  
TECHNOLOGY, CO., LTD., ELLIOTT  
ELECTRIC SUPPLY INC., AND SHAOXING  
RUISING LIGHTING CO., LTD.*

By: /s/ Abigail A. Gardner

Matthew C. Bernstein  
California State Bar No. 199240  
MBernstein@perkinscoie.com  
Evan S. Day (Pro Hac Vice)  
EDay@perkinscoie.com  
Miguel J. Bombach (Pro Hac Vice)  
MBombach@perkinscoie.com  
Ruchika Verma (Pro Hac Vice)  
[RVerma@perkinscoie.com](mailto:RVerma@perkinscoie.com)  
Abigail A. Gardner  
California State Bar No. 334598  
AGardner@perkinscoie.com  
PERKINS COIE LLP  
11452 El Camino Real, Suite 300  
San Diego, CA 92130  
Telephone: (858) 720-5700  
Facsimile: (858) 720-5799

Skyler M. Howton  
Texas Bar No. 24077907  
SHowton@perkinscoie.com  
500 N. Akard Street, Suite 3300  
Dallas, TX 75201-3347  
Telephone: (214) 259-4951  
Facsimile: (214) 965-7752

*Attorneys for Plaintiff JIAXING SUPER  
LIGHTING ELECTRIC APPLIANCE CO., LTD.  
AND OBERT, INC.*

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing document has been served on June 8, 2021, via the Court's CM/ECF system on all counsel of record who have consented to electronic service.

By: /s/ Robert S. Hill  
Robert S. Hill